

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CYNTHIA L. MERLINI,

Plaintiff,

v.

CANADA,

Defendant.

Case No. 1:17-cv-10519-NMG

**DEFENDANT'S ASSENTED-TO MOTION FOR ADMISSION *PRO HAC VICE* OF
D. EDWARD (ED) WILSON, JR., ANDREW E. BIGART AND BENJAMIN HOROWITZ**

Now comes the Defendant, the Government of Canada, and hereby moves this Honorable Court, pursuant to L.R., D.Mass. 83.5.3, for the admission of D. Edward (Ed) Wilson, Jr., Esq., Andrew E. Bigart, Esq., and Benjamin E. Horowitz, Esq. of the law firm of Venable, LLP, 600 Massachusetts Avenue, NW, Washington, DC 20001 to appear and practice, *pro hac vice*, on its behalf in this matter. In support of this motion, Canada states as follows:

1. Venable LLP has been retained by Canada as litigation counsel. D. Edward (Ed) Wilson, Jr., Andrew E. Bigart, and Benjamin E. Horowitz have direct responsibility for this matter and their appearance will provide material assistance to Canada in defending this action.

2. D. Edward (Ed) Wilson, Jr., Esq. is a member in good standing of the bars of the District of Columbia and Louisiana.

3. Andrew E. Bigart, Esq. is a member in good standing of the bars of the District of Columbia and Virginia.

4. Benjamin E. Horowitz Esq. is a member in good standing of the bars of the District of Columbia and Maryland.

5. Attached to this motion, pursuant to Local Rule 83.5.3(e)(3), are Certifications signed by D. Edward (Ed) Wilson, Jr., Esq., Andrew E. Bigart, Esq., and Benjamin E. Horowitz, Esq.

6. The fee required by Local Rule 85.5.3(e)(4) is being filed herewith.

7. The undersigned hereby certifies, pursuant to L.R., D.Mass. 7.1(a)(2), that counsel for Canada has conferred with Plaintiff's counsel and that Plaintiff has assented to this motion.

WHEREFORE, the Defendant, through its local counsel, respectfully moves that D. Edward (Ed) Wilson, Jr., Esq., Andrew E. Bigart, Esq., and Benjamin E. Horowitz, Esq. be permitted to appear and to practice *pro hac vice* on Canada's behalf in this case.

Respectfully Submitted,
Local Counsel for the Defendant,

/s/ Chrisann Leal

Paul M. Moretti, BBO #552488

Chrisann Leal, BBO 566402

Michael C. Houlihan, BBO #690573

CURTIN, MURPHY & O'REILLY, P.C.

Park Square Building, 3rd Floor

Boston, Massachusetts 02116

Telephone: (617) 574-1700

Facsimile: (617) 574-1710

pmoretti@cmopc.com

cleal@cmopc.com

mhoulihan@cmopc.com

Certificate of Service

I, Chrisann Leal, hereby certify that true copy of the above document was served upon the attorney of record for the Plaintiff electronically on June 19, 2017.